

EXHIBIT D

From: Kevin A. Fritz
To: Bender, Kristin; Roeser, Stephanie; Theresa Troupson; Chip Babcock; Joel Glover; Bryan Freedman; Miles Cooley; Jason Sunshine; Mitch Schuster; Stacey Ashby; Amit Shertzer; mitra@ahouraijanlaw.com; Christina Puello; Cortni Davis; Vaneta Birtha; Jose Perez; Ellyn Garofalo; Summer Benson
Cc: Gottlieb, Michael; Governski, Meryl Conant; Nathan, Aaron E.; Bruno, Matthew; Connolly, Michaela; Hudson, Esra; Climaco, Katelyn; Taustine, Melissa
Bcc: 13133_1 Wayfarer Studios LLC et al_ Blake Lively_Emails
Subject: RE: Lively v. Wayfarer
Date: Thursday, June 12, 2025 8:43:16 PM
Attachments: image001.png
image002.png

Kristin, thank you for your email. Please let me know if all documents responsive to the categories specified below will be in tomorrow's production.



Kevin A. Fritz

Partner

125 Park Avenue | 7th Floor | New York, NY | 10017
Direct (212) 655-3570 | Firm (212) 655-3500 | Fax (646) 564-4819 | kaf@msf-law.com
[New York](#) | [New Jersey](#) | [Connecticut](#) | [California](#) | [Website](#)

IMPORTANT NOTICES: NOTICE UNDER E-SIGN ACT: Unless specifically set forth herein, the transmission of this communication is not intended to be a legally binding electronic signature, and no offer, commitment or assent on behalf of the sender or its client is expressed or implied by the sending of this facsimile, or any attachments hereto.

NOTICE OF ATTORNEY'S CONFIDENTIALITY: The material submitted herewith contains, and is intended to be a confidential transmission of information or documents from MEISTER SEELIG & FEIN PLLC which is legally privileged. The materials or information enclosed are intended only for the use of the individual or entity named in this transmission sheet. If you are not the intended recipient, any disclosure, copying, distribution or the taking of any action in reliance on the contents of this transmission is strictly prohibited. If you have received this telecopy transmission in error, please notify us by telephone immediately, so that we can arrange for the return of the original documents to us at our cost.

IRS CIRCULAR 230 DISCLOSURE: As required by U.S. Treasury Regulations governing tax practice, you are hereby advised that any written tax advice contained herein was not written or intended to be used (and cannot be used) by any taxpayer for the purpose of avoiding penalties that may be imposed under the U.S. Internal Revenue Code.

From: Bender, Kristin <KBender@willkie.com>
Sent: Thursday, June 12, 2025 8:40 PM
To: Kevin A. Fritz <kaf@msf-law.com>; Roeser, Stephanie <S.Roeser@manatt.com>; Theresa Troupson <ttroupson@lftcllp.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Mitch Schuster <ms@msf-law.com>; Stacey Ashby <sma@msf-law.com>; Amit Shertzer <as@msf-law.com>; mitra@ahouraijanlaw.com; Christina Puello <cpuello@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Hudson, Esra <EHudson@manatt.com>; Climaco, Katelyn <KClimaco@manatt.com>; Taustine, Melissa <MTaustine@willkie.com>
Subject: RE: Lively v. Wayfarer

CAUTION: This is an external email. DO NOT click links or open attachments unless you can confirm the sender and know the content is safe.

Hi Kevin,

We are available at the time you propose. We will send an invite.

As to your position below, the Wayfarer Parties have already received multiple productions from Sony and WME, and

the Wayfarer Parties and Ms. Lively mutually are engaged in making rolling productions in advance of the substantial completion deadline. This is the first time that you have raised a concern with the pace of Ms. Lively's productions, and the Wayfarer Parties have only made two voluntarily productions, or three including the compelled production. Ms. Lively has also produced 2,832 documents, and all of the Wayfarer Parties collectively have produced only 754 documents (including those that were compelled). In any event, Ms. Lively intends to make her next production tomorrow (6/13), and to make regular rolling productions thereafter that will satisfy substantial completion obligations by July 1. All this said, we will be ready to discuss the parties' productions, as needed.

All rights reserved, including with respect to the positions stated below. Finally, as an administrative matter, please keep Melissa Taustine copied on counsel correspondence.

Thanks,
Kristin

Kristin Bender
Willkie Farr & Gallagher LLP
1875 K Street, N.W. | Washington, DC 20006-1238
Direct: [+1 202 303 1245](tel:+12023031245) | Mobile: [+1 703 732 4995](tel:+17037324995)
kbender@willkie.com | [vCard](#) | [www.willkie.com bio](http://www.willkie.com/bio)

From: Kevin A. Fritz <kaf@msf-law.com>
Sent: Thursday, June 12, 2025 4:51 PM
To: Roeser, Stephanie <S.Roeser@manatt.com>; Theresa Troupson <ttroupson@lftcllp.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Mitch Schuster <ms@msf-law.com>; Stacey Ashby <sma@msf-law.com>; Amit Shertzer <as@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cpuello@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>
Cc: Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Nathan, Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Connolly, Michaela <MConnolly@willkie.com>; Hudson, Esra <EHUDSON@manatt.com>; Climaco, Katelyn <KCLIMACO@manatt.com>; Bender, Kristin <KBender@willkie.com>
Subject: RE: Lively v. Wayfarer

*** EXTERNAL EMAIL ***

Counselors:

We are available to meet/confer at noon PST / 3pm EST on Friday about Michaela Connolly's email concerning our document production and about Esra Hudson's letter concerning Blake Lively's June 23, 2025 deposition. For the sake of expediency, please also be prepared to discuss Lively's woefully deficient document production. Even though we served our First Set of Request for Production months ago, and even though ten weeks ago Lively assured us via her formal responses and objections thereto that she would conduct a reasonable search for and produce relevant, non-privileged documents, she has produced nothing other than documents she "obtained" from her company Vanzan, Inc. As merely a few examples, Lively has not produced: Documents and communications relating to her allegations of sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 3);

1. Documents and communications relating to and/or reflecting her communications with Sony relating to sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 48);
2. Documents and communications relating to and/or reflecting her communications with WME relating to sexual harassment and/or other misconduct relating to the Film (Doc. Req. No. 51);
3. Documents and communications relating to her claims for damages (such as those supporting her allegation, in paragraph 457 of her Amended Complaint, that she "has suffered and continues to suffer

substantial damages, including, but not limited to, past and future losses in earnings, equity, and other employment benefits and has incurred other economic losses...”);

4. Documents and communications with Taylor Swift who, according to Lively’s Amended Initial Disclosures, has knowledge of “The parties’ alleged conduct; complaints or discussions about the work environment or conduct on the set of the Film; the production, editing, cut, and creative process associated with the Film; publicity surrounding the Film; the retaliation campaign alleged by Ms. Lively and resulting damages suffered.”

Given that such documents and communications are material and relevant to the crux of Lively’s claims, and given that more than two months have passed since Lively assured us that such documents would be produced, we intent to promptly raise this issue with the Court unless a mutually agreeable resolution is reached.



Meister Seelig & Fein PLLC

Kevin A. Fritz

Partner

125 Park Avenue | 7th Floor | New York, NY | 10017

Direct (212) 655-3570 | Firm (212) 655-3500 | Fax (646) 564-4819 | kaf@msf-law.com

[New York](#) | [New Jersey](#) | [Connecticut](#) | [California](#) | [Website](#)

IMPORTANT NOTICES: NOTICE UNDER E-SIGN ACT: Unless specifically set forth herein, the transmission of this communication is not intended to be a legally binding electronic signature, and no offer, commitment or assent on behalf of the sender or its client is expressed or implied by the sending of this facsimile, or any attachments hereto.

NOTICE OF ATTORNEY’S CONFIDENTIALITY: The material submitted herewith contains, and is intended to be a confidential transmission of information or documents from MEISTER SEELIG & FEIN PLLC which is legally privileged. The materials or information enclosed are intended only for the use of the individual or entity named in this transmission sheet. If you are not the intended recipient, any disclosure, copying, distribution or the taking of any action in reliance on the contents of this transmission is strictly prohibited. If you have received this telecopy transmission in error, please notify us by telephone immediately, so that we can arrange for the return of the original documents to us at our cost.

IRS CIRCULAR 230 DISCLOSURE: As required by U.S. Treasury Regulations governing tax practice, you are hereby advised that any written tax advice contained herein was not written or intended to be used (and cannot be used) by any taxpayer for the purpose of avoiding penalties that may be imposed under the U.S. Internal Revenue Code.

From: Roeser, Stephanie <SROeser@manatt.com>

Sent: Wednesday, June 11, 2025 11:59 PM

To: Theresa Troupson <ttroupson@lftcllp.com>; Kevin A. Fritz <kaf@msf-law.com>; Chip Babcock <cbabcock@jw.com>; Joel Glover <jglover@jw.com>; Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Mitch Schuster <ms@msf-law.com>; Stacey Ashby <sma@msf-law.com>; Amit Shertzer <as@msf-law.com>; mitra@ahouraianlaw.com; Christina Puello <cpuello@lftcllp.com>; Cortni Davis <cdavis@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>; Jose Perez <jperez@lftcllp.com>; Ellyn Garofalo <egarofalo@lftcllp.com>; Summer Benson <sbenson@lftcllp.com>

Cc: Michael Gottlieb <MGottlieb@willkie.com>; Meryl Conant Governski <MGovernski@willkie.com>; Nathan Aaron E. <ANathan@willkie.com>; Bruno, Matthew <MBruno@manatt.com>; Michaela Connolly <MConnolly@willkie.com>; Hudson, Esra <EHudson@manatt.com>; Climaco, Katelyn <KClimaco@manatt.com>; Bender, Kristin <kbender@willkie.com>

Subject: Lively v. Wayfarer

CAUTION: This is an external email. DO NOT click links or open attachments unless you can confirm the sender and know the content is safe.

Counsel,

Please see attached correspondence.

Thanks,
Stephanie

Stephanie Roeser

Partner

Manatt, Phelps & Phillips, LLP
2049 Century Park East
Suite 1700
Los Angeles, CA 90067
D (310) 312-4207 **F** (310) 914-5744
S.Roeser@manatt.com

manatt.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it, may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this message is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify us by reply email and destroy the original transmission and its attachments without reading them or saving them to disk. Thank you.

Important Notice: This email message is intended to be received only by persons entitled to receive the confidential information it may contain. Email messages to clients of Willkie Farr & Gallagher LLP presumptively contain information that is confidential and legally privileged; email messages to non-clients are normally confidential and may also be legally privileged. Please do not read, copy, forward or store this message unless you are an intended recipient of it. If you have received this message in error, please forward it back. Willkie Farr & Gallagher LLP is a limited liability partnership organized in the United States under the laws of the State of Delaware, which laws limit the personal liability of partners.